

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:24-MJ-253
)	
OLAJIDE BENJAMIN AYILARAN)	
a.k.a. "Benji",)	<u>UNDER SEAL</u>
)	
<i>Defendant.</i>)	
_____)	

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Roman Nepomnashi, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I submit this affidavit in support of a criminal complaint and arrest warrant charging Olajide Benjamin AYILARAN, a resident of Prince William County, Virginia, with sexual exploitation of children, in violation of Title 18, U.S. Code, Section 2251(a) and (e). For the reasons set forth below, I submit that there is probable cause to believe that between on or about December 9, 2023, and on or about February 29, 2024, AYILARAN knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and attempted to do so, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

2. I am an investigative or law enforcement officer within the meaning of Title 18, U.S. Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Titles 18 and 21 of the

United States Code. Since October 2019, I have been employed as a Special Agent with Homeland Security Investigations (HSI). I have been assigned to the Child Exploitation Group in Washington, D.C. since December 2023. Prior to this, I was assigned to the Organized Crime Drug Enforcement Task Force (OCDETF) Strikeforce in San Diego, California. Prior to HSI, I was employed by the Metropolitan Police Department in Washington D.C. (MPDC) for approximately 6 years. While employed by MPDC, I worked as a patrol officer, street crimes officer, felony detective, and homicide detective.

3. As a Special Agent assigned to the Child Exploitation Group, I am responsible for investigating criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt, transportation, possession, and access with intent to view of child pornography, in violation of 18 U.S.C. § 2252. I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in 18 U.S.C. § 2256(8), including computer media. Through my experience and training, I can identify child pornography when I see it.

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent. This affidavit contains information necessary to support probable cause for this application. This affidavit is intended to show simply that there is sufficient probable cause

for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter.

SUMMARY OF PROBABLE CAUSE

5. As further described below, in March 2024, the Fairfax County Police Department (FCPD) received information that a minor girl (hereinafter, “MV1”) had engaged in sex acts with an individual, determined through investigation to be AYILARAN, in exchange for drugs and alcohol. On March 18, 2024, AYILARAN was arrested by FCPD for a violation of Va Code Ann. § 18.2-63 (carnal knowledge of a minor). A review of his Apple iPhone 14 Plus (S/N YHG719XVX6), seized incident to arrest and searched pursuant to state and federal search warrants, revealed that over the course of at least two months, AYILARAN exchanged numerous text messages with MV1 to arrange for her to meet in person and perform sex acts on him in exchange for vape pens, marijuana, and alcohol. Furthermore, on at least 9 different occasions, AYILARAN used his cell phone to record the sex acts with MV1.

A. Initial report to FCPD

6. On or about March 5, 2024, MV1’s guardian made a report to FCPD that MV1, who has a date of birth in 2008, disclosed she had engaged in sex acts with a man in exchange for marijuana, vapes, and alcohol. MV1 provided FCPD with the individual’s social media username and phone number.¹ MV1 also said that at one point when she was on the phone with the individual, she heard someone refer to him as “Benji.” FCPD detectives located a previous report in which AYILARAN was the user of the phone number provided by MV1. Additionally, AYILARAN’s driver’s license photo matched the Instagram profile picture of the account

¹ MV1’s guardian provided MV1’s cell phone to FCPD for review, however the phone was inadvertently locked and unable to be examined. Law enforcement is currently working on unlocking the device.

provided by MV1. The vehicle registered to AYILARAN, a black in color Honda HR-V, also matched the vehicle description provided by MV1.

B. FCPD Arrest of AYILARAN and Review of his Apple iPhone 14 Plus

7. FCPD obtained a complaint and arrest warrant charging AYILARAN with carnal knowledge of a minor, in violation of Va Code Ann. § 18.2-63 (carnal knowledge of a minor). On March 18, 2024, FCPD observed AYILARAN at his place of employment. As AYILARAN drove away from the building, law enforcement stopped his vehicle and arrested him. AYILARAN's Apple iPhone 14 Plus (S/N YHG719XVX6) was seized from the front seat of his vehicle incident to his arrest.

8. Subsequent to his arrest, AYILARAN was interviewed by FCPD detectives. I reviewed the recordings of the interview. AYILARAN was provided his *Miranda* rights and agreed to speak with the detectives. At first, AYILARAN denied that he knew MV1. Later, AYILARAN admitted that he engaged in oral sex with MV1 and recorded it on his cell phone. However, he stated that he was not aware that MV1 was a minor.

9. The FCPD detective obtained a state search warrant for AYILARAN's iPhone 14 Plus to review it for evidence related to the offense of carnal knowledge of a minor. FCPD's Digital Forensics Section performed a forensic extraction of the iPhone 14 Plus. When the FCPD detective reviewed the forensic extraction of the iPhone, he observed several images and videos that appeared to depict child sexual abuse material, including but not limited to MV1, a minor, engaged in sexually explicit conduct.

C. HSI's forensic examination of AYILARAN's cell phone

10. FCPD provided me with the forensic extraction of AYILARAN's iPhone 14 Plus. I reviewed the forensic extraction and obtained a search warrant to search the extraction for

evidence related to HSI's child exploitation investigation.

Sexually Explicit Images and Videos on AYILARAN's iPhone 14 Plus

11. Forensic review of AYILARAN's iPhone 14 Plus revealed hundreds of images and videos depicting minors engaged in sexually explicit conduct. Specific to MV1, I observed approximately 30 videos and 43 images depicting MV1 performing oral sex on AYILARAN. The images were stored in the media folder of AYILARAN's phone. AYILARAN's vehicle can be seen in most of the videos, and AYILARAN's face appears in at least one of the videos. Additionally, the videos of MV1 performing oral sex on AYILARAN contained EXIF data, including the latitude and longitude of the location where the video was created. According to the EXIF data, the videos were created at two different locations in Centreville, Virginia, within the Eastern District of Virginia.

iMessages Between MV1 and AYILARAN

12. In addition to the images and videos of MV1, I also found iMessages with MV1 in AYILARAN's iPhone 14 Plus. The messages spanned from December 9, 2023, to February 29, 2024. The conversations were sexual and largely centered on arranging a time and place to meet for sex acts in exchange for vape and alcohol products.

13. For example, on December 9, 2023, AYILARAN arranged with MV1 to meet at an address in Centreville. MV1 asked AYILARAN to bring a "preroll" to the location.² AYILARAN agreed to bring the preroll and then told MV1 "Better get yo freak on tonight." At 10:21 PM (EST), AYILARAN messaged MV1 "3 mins away" and at 10:23 PM (EST) he said, "Here[.]"

14. AYILARAN's iPhone 14 Plus contains a video with a creation date and time of

² Based on my training and experience, I know that a "preroll" is a term commonly used to refer to commercially sold marijuana wrapped in cigar paper.

December 9, 2023 at 10:35 PM. The video depicts MV1 performing oral sex on AYILARAN in his vehicle. The video also contained location information which showed that it was created in a parking lot approximately four minutes away from the address that MV1 provided to AYILARAN in the chat.

15. On December 13, 2023, AYILARAN messaged MV1 and asked, “Wanna suck me tmr for a preroll[?]” MV1 said “Yes” and they arranged to meet later that day. AYILARAN told MV1, “I wanna lick ur fat clit” and “Can I[?]”

16. AYILARAN’s iPhone 14 Plus contains a video with a creation date and time of December 13, 2023 at 10:49 PM. The video depicts MV1 performing oral sex on AYILARAN in his vehicle. The location information for the video places it in the same parking lot as the video described in Paragraph 14.

17. On January 17, 2024, AYILARAN and MV1 made plans to meet the following day. MV1 requested that AYILARAN bring “nic”—specifically a “Luffbar blackberry slushy.”³ Later that day, MV1 asked AYILARAN if he had purchased the requested item and to send her a picture of it. AYILARAN sent MV1 a photo, and MV1 responded by sending 2 videos of her lying in bed and squeezing her exposed breast. AYILARAN asked MV1 to “show booty,” but she refused and told him that she would see him the next morning at 6:00 AM.

18. MV1 overslept and missed the meeting, and they rescheduled another meeting for January 19, 2024. AYILARAN texted MV1, “Can’t wait for u to choke on this dick tmr.” MV1 told AYILARAN that she wanted both a preroll and nic, and AYILARAN agreed. On January 19, 2024, at 5:43 AM, AYILARAN messaged “On my way!” and at 6:12 AM he texted “Here.”

³ Based on my training and experience, “nic” refers to a cartridge insert for a vape pen containing nicotine products.

19. Review of AYILARAN's iPhone 14 Plus revealed a video with a creation date and time of January 19, 2024 at 6:21 AM. The video depicts MV1 on her hands and knees in the front passenger seat of AYILARAN's vehicle with her pants off and wearing underwear. MV1 was bent over AYILARAN's crotch and is shown performing oral sex on him. The video then depicts AYILARAN digitally penetrate MV1's vagina. Shortly after, AYILARAN stated, "I love that 14-year-old pussy." Later in the video, AYILARAN asked MV1 if she would come on Monday if he got her another pre-roll. AYILARAN stated, "damn I love this 14-year-old." The video recording continued for approximately three minutes and eight seconds and ended with AYILARAN ejaculating into MV1's mouth.

20. The messages between AYILARAN and MV1 continued almost daily through February 2024. During their chats, AYILARAN and MV1 made plans to meet in person on at least 9 separate occasions. My review of AYILARAN's iPhone 14 Plus revealed sexually explicit videos of MV1 taken on 9 separate encounters, including 2 videos that were observed outside of the time frame of the chats in AYILARAN's iPhone. The videos depict MV1 performing oral sex on AYILARAN as well as AYILARAN digitally penetrating MV1's vagina.

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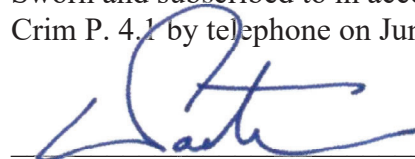
CONCLUSION

21. Based on the foregoing, I respectfully submit there is probable cause to believe that between on or about December 9, 2023, and on or about February 29, 2024, AYILARAN committed a violation of 18 U.S.C. § 2251(a) and (e) (sexual exploitation of children). I therefore respectfully request that a criminal complaint and arrest warrant be issued for AYILARAN.

Respectfully submitted,

Roman Nepomnashi
Roman Nepomnashi, Special Agent
Homeland Security Investigations

Sworn and subscribed to in accordance with Fed. R.
Crim P. 4.1 by telephone on June 27, 2024.



The Hon. William B. Porter
United States Magistrate Judge
Alexandria, Virginia